

EXHIBIT “A”

Court of Common Pleas of Philadelphia County
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

MAY 2025**03428**

E-Filing Number: 2505059969

PLAINTIFF'S NAME LINDA RAGIN		DEFENDANT'S NAME LIVE CASINO HOTEL PHILADELPHIA	
PLAINTIFF'S ADDRESS 9707 HORACE HARDING EXPRESSWAY APARTMENT 16H CORONA NY 11368		DEFENDANT'S ADDRESS 900 PACKER AVENUE PHILADELPHIA PA 19148	
PLAINTIFF'S NAME GEORGE RAGIN		DEFENDANT'S NAME STADIUM CASINO RE, LLC, ALIAS: D/B/A LIVE CASINO AND HOTEL PHILADELPHIA LIVE CASINO	
PLAINTIFF'S ADDRESS 9707 HORACE HARDING EXPRESSWAY APARTMENT 16H CORONA NY 11368		DEFENDANT'S ADDRESS 900 PACKER AVENUE PHILADELPHIA PA 19148	
PLAINTIFF'S NAME		DEFENDANT'S NAME GAMING AND LEISURE PROPERTIES, INC.	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 845 BERKSHIRE BLVD. WYOMISSING PA 19610	
TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 7	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: _____		
CASE TYPE AND CODE 2S - PREMISES LIABILITY, SLIP/FALL			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		<div style="text-align: center;"> FILED PRO PROTHY MAY 28 2025 B. BALILONIS </div>	
		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>LINDA RAGIN , GEORGE RAGIN</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY JEFFREY M. ROSENBAUM		ADDRESS 1818 MARKET STREET SUITE 3200 PHILADELPHIA PA 19103	
PHONE NUMBER (215) 569-0200	FAX NUMBER (215) 569-6099		
SUPREME COURT IDENTIFICATION NO. 51719		E-MAIL ADDRESS filings@rosenbaumfirm.com	
SIGNATURE OF FILING ATTORNEY OR PARTY JEFFREY ROSENBAUM		DATE SUBMITTED Wednesday, May 28, 2025, 11:16 am	

COMPLETE LIST OF DEFENDANTS:

1. LIVE CASINO HOTEL PHILADELPHIA
900 PACKER AVENUE
PHILADELPHIA PA 19148
2. STADIUM CASINO RE, LLC
ALIAS: D/B/A LIVE CASINO AND HOTEL PHILADELPHIA LIVE CASINO
900 PACKER AVENUE
PHILADELPHIA PA 19148
3. GAMING AND LEISURE PROPERTIES, INC.
845 BERKSHIRE BLVD.
WYOMISSING PA 19610
4. CORDISH COMPANIES
601 EAST PRATT STREET 6TH FLOOR
BALTIMORE MD 21202
5. THE CORDISH COMPANY, USA
601 EAST PRATT STREET 6TH FLOOR
BALTIMORE MD 21202
6. GLP CAPITAL, LP
825 BERKSHIRE BOULEVARD SUITE 400
WYOMISSING PA 19610
7. JOHN DOES I-III
ALIAS: (FICTITIOUS NAME)
900 PACKER AVENUE
PHILADELPHIA PA 19148

ROSENBAUM & ASSOCIATES, P.C.
 By: JEFFREY M. ROSENBAUM, ESQ. – ID #51719
 1818 Market Street, Suite 3200
 Philadelphia, PA 19103
 (215) 569-0200

MAJOR NON JURY
 Hearing on Assessment of Damages is Required
 Filed and Attested by the
 Assess of Judicial Records
 28 MAY 2025 11:16 am
 BALILONTIS

Attorney for Plaintiff

LINDA RAGIN and GEORGE RAGIN, as h/w : PHILADELPHIA COUNTY
 9707 Horace Harding Expressway, Apartment 16H : COURT OF COMMON PLEAS
 Corona, NY 11368 :

Plaintiffs : TERM, 2025

vs. :

LIVE CASINO HOTEL PHILADELPHIA : NO.

900 Packer Avenue :

Philadelphia, PA 19148 and :

601 East Pratt Street, 6th Floor :

Baltimore, MD 21202 :

and :

STADIUM CASINO RE, LLC d/b/a LIVE :

CASINO AND HOTEL PHILADELPHIA :

LIVE CASINO :

900 Packer Avenue :

Philadelphia, PA 19148 and :

601 East Pratt Street, 6th Floor :

Baltimore, MD 21202 :

and :

GAMING AND LEISURE PROPERTIES, INC. :

845 Berkshire Boulevard :

Wyomissing, PA 19610 :

and :

CORDISH COMPANIES :

601 East Pratt Street, 6th Floor :

Baltimore, MD 21202 :

and :

THE CORDISH COMPANY, USA :

601 East Pratt Street, 6th Floor :

Baltimore, MD 21202 :

and :

GLP CAPITAL, LP :

825 Berkshire Boulevard, Suite 400 :

Wyomissing, PA 19610 :

and :

JOHN DOES I-III (FICTITIOUS NAMES) :

Defendants _____ :

2S Premises Liability – Complaint in Civil Action

NOTICE

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE COMPLAINT OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERRAL & INFORMATION SERVICE, Philadelphia Bar Assn.

1101 Market Street, 11th Floor

Philadelphia, Pennsylvania 19107, Phone: (215) 238-6333

AVISO

LE HAN DEMANDADO A USTED EN LA CORTE. SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINAS SIGUIENTES, USTED TIENE VIENTE (20) DIAS DE PLAZO AL PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICACION. HACE FALTA ASENTAR UNA COMPARENCIA ESCRITA O EN PERSONA O CON UN ABOGADO Y ENTREGAR A LA CORTE EN FORMA ESCRITA SUS DEFENSAS O SUS OBJECIONES A LAS DEMANDAS EN CONTRA DE SU PERSONA. SEA AVISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE CONTINUAR LA DEMANDA EN CONTRA SUYA SIN PREVIO AVISO O NOTIFICACION. ADEMAS, LA CORTE PUEDE DECIDIR A FAVOR DEL DEMANDANTE Y REQUIERE QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. USTED PUEDE PERDER DINERO O SUS PROPIEDADES U OTROS DERECHOS IMPORTANTES PARA USTED. LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SERVICIO DE REFERENCIA E INFORMACION LEGAL, Asociacion De Licenciados De Filadelfia, 1101 Market Street, 11th Floor, Filadelfia, PA 19107 Telefono: (215) 238-6333

ROSENBAUM & ASSOCIATES, P.C.
 By: JEFFREY M. ROSENBAUM, ESQ. – ID #51719
 1818 Market Street, Suite 3200
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MAJOR NON-JURY
 Hearing on Assessment
 of Damages is Required

Attorney for Plaintiff

LINDA RAGIN and GEORGE RAGIN, as h/w : PHILADELPHIA COUNTY
 9707 Horace Harding Expressway, Apartment 16H : COURT OF COMMON PLEAS
 Corona, NY 11368 :

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CASINO AND HOTEL PHILADELPHIA :

LIVE CASINO :

900 Packer Avenue :

Philadelphia, PA 19148 and :

601 East Pratt Street, 6th Floor :

Baltimore, MD 21202 :

and :

GAMING AND LEISURE PROPERTIES, :
 INC. :

845 Berkshire Boulevard :

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and :

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601 East Pratt Street, 6th Floor :

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THE CORDISH COMPANY, USA :

601 East Pratt Street, 6th Floor :

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GLP CAPITAL, LP :

825 Berkshire Boulevard, Suite 400 :

Wyomissing, PA 19610 :

and :

JOHN DOES I-III (FICTITIOUS NAMES) :

Defendants :

2S Premises Liability – Complaint in Civil Action

1. The plaintiffs, Linda Ragin and George Ragin, are husband and wife and residents of the Commonwealth of Pennsylvania, residing at the above address
2. The defendant, Live Casino Hotel Philadelphia, is a corporation, limited liability company, partnership or fictitious name of an individual or individuals, with a place of business located at the above address.
3. The defendant, Stadium Casino RE, LLC, d/b/a Live Casino and Hotel Philadelphia Live Casino, is a corporation, limited liability company, partnership or fictitious name of an individual or individuals, with a place of business located at the above address.
4. The defendant, Gaming and Leisure Properties, Inc., is a corporation, limited liability company, partnership or fictitious name of an individual or individuals, with a place of business located at the above address.
5. The defendant, Cordish Companies, is a corporation, limited liability company, partnership or fictitious name of an individual or individuals, with a place of business located at the above address.
6. The defendant, The Cordish Company USA, Inc., is a corporation, limited liability company, partnership or fictitious name of an individual or individuals, with a place of business located at the above address.
7. The defendant, GLP Capital, LP, is a corporation, limited liability company, partnership or fictitious name of an individual or individuals, with a place of business located at the above address.
8. The defendant, John Does I-III (fictitious names) are individuals, corporations and/or other entities whose identities, after reasonable investigation, are currently unknown, but at all times relevant hereto owned, operated and controlled the premises and had the duty to maintain the premises and floor at 900 Packer Avenue, Philadelphia, Pennsylvania.

9. At all times relevant hereto, the defendants were acting through their agents, servants and/or employees within the course and scope of their employment, and the doctrine of Respondeat Superior is invoked herein.
10. At all times relevant hereto, all defendants were acting as the agents, servants, workmen and/or employees of all other named defendants.
11. At all times relevant hereto, defendants had under their care, direction, ownership, supervision, control and maintenance the premises and floor at Live Casino Hotel Philadelphia, 900 Packer Avenue, Philadelphia, Pennsylvania, and it was the defendants' duty to keep and maintain said premises and floor in a reasonably safe condition.
12. On or about the 18th day of January, 2025, a dangerous, negligent and/or defective condition existed on the defendants' premises as aforesaid and defendants knew or should have known of the existence of same.
13. On the aforesaid date, the plaintiff, Linda Ragin, was a business invitee lawfully at Live Casino Hotel Philadelphia, located at 900 Packer Avenue, Philadelphia, Pennsylvania, and had entered the casino from the parking garage, when by reason of the negligence of the defendants, the plaintiff was caused to trip, slip, stumble and/or fall due a wet floor, a result of which caused plaintiff to sustain serious and severe injuries as more fully set forth herein.
14. The defendants knew or should have known of the existence of the dangerous, negligent and/or defective condition on the aforesaid premises.
15. The carelessness and/or negligence of the defendants consisted of the following:
 - a. Failing to maintain said premises and floor in a safe and reasonable condition for persons such as the plaintiff using said premises and floor;
 - b. Failing to reasonably inspect said premises and floor to ascertain the existence of the dangerous, negligent and/or defective condition when defendants knew or should have known of the existence of said condition;

- c. Failing to warn persons on the premises of the dangerous, negligent and/or defective condition;
- d. Failing to properly and adequately remedy said condition;
- e. Negligently allowing said defect to remain on said premises and floor;
- f. Causing the floor of the premises to become wet and slippery;
- g. Failing to promptly and carefully post warning signs, place floor mats and/or post notices to warn persons of the defective condition;
- h. Failing to properly and adequately clean the floor;
- i. Failing to provide an adequately slip resistant floor;
- j. Failing to properly supervise persons maintaining defendants' premises and floor; and,
- k. Failing to respond to requests to remedy said defective condition.

COUNT I

PLAINTIFF, LINDA RAGIN, vs. ALL DEFENDANTS

- 16. The plaintiff, Linda Ragin, hereby incorporates by reference herein the allegations contained in the preceding paragraphs of this Complaint as though same were fully set forth at length herein.
- 17. Solely because of the negligence of the defendants acting as aforesaid, the plaintiff was caused to sustain serious physical injury in and about the person, including but not limited to plaintiff's shoulder, as well as a severe shock to the nerves and nervous system and was or may have been otherwise injured, whereby plaintiff has suffered and may continue to suffer in the future.
- 18. Plaintiff may have sustained other injuries and pre-existing conditions may have been aggravated.

19. Plaintiff avers that some or all of the injuries sustained may be or are of a permanent nature and character.
20. As a further result of the aforesaid accident, plaintiff has been unable in the past, and is likely to continue to be unable in the future, to attend to plaintiff's usual duties, activities, vocations and avocations, all to plaintiff's great financial loss and detriment.
21. As a further result of the aforesaid accident and resultant injuries, plaintiff has expended and is in the future likely to expend substantial sums of monies for the care, treatment and attempted cure of plaintiff's injuries, all to plaintiff's great financial loss and detriment.
22. As a further result of the aforesaid accident and resultant injuries, plaintiff has been caused to undergo in the past and is likely to undergo in the future, severe pain, suffering, inconvenience and embarrassment, all to plaintiff's great financial loss and detriment.

WHEREFORE, plaintiff, Linda Ragin, demands judgment against defendants, Live Casino Hotel Philadelphia, Stadium Casino RE, LLC, d/b/a Live Casino and Hotel Philadelphia Live Casino, Gaming and Leisure Properties, Inc., Cordish Companies, The Cordish Company USA, Inc., GLP Capital, LP and John Does I-III (fictitious names), in a sum not in excess of the arbitration limits.

COUNT II

PLAINTIFF, GEORGE RAGIN, vs. ALL DEFENDANTS

23. The plaintiff, George Ragin, hereby incorporates by reference herein the allegations contained in the preceding paragraphs of this Complaint as though same were fully set forth at length herein.
24. Plaintiff avers that he is the spouse of plaintiff, Linda Ragin.

25. As a result of the aforementioned occurrence, said plaintiff has been and may in the future be required to expend various sums of money for medical services, medicines and/or x rays in an effort to treat and cure the spouse of the injuries sustained in the occurrence and has incurred or may incur other losses for which plaintiff is entitled to be compensated.
26. Further, by reason of the aforesaid, said plaintiff has been deprived of the assistance and society of the spouse, all of which has been to the great financial damage and loss of plaintiff.

WHEREFORE, plaintiff, George Ragin, demands judgment against defendants, Live Casino Hotel Philadelphia, Stadium Casino RE, LLC, d/b/a Live Casino and Hotel Philadelphia Live Casino, Gaming and Leisure Properties, Inc., Cordish Companies, The Cordish Company USA, Inc., GLP Capital, LP and John Does I-III (fictitious names), in a sum not in excess of the arbitration limits.

ROSENBAUM AND ASSOCIATES, P.C.

By:



JEFFREY M. ROSENBAUM, ESQ.
Attorney for Plaintiffs

DATE:_____

VERIFICATION

Jeffrey M. Rosenbaum, Esquire, states that he is the attorney for the Plaintiffs herein, that he is acquainted with the facts set forth in the foregoing Complaint in Civil Action and that the same are true and correct to the best of his knowledge, information and belief; and that this statement is made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.



JEFFREY M. ROSENBAUM, ESQUIRE

DATE: _____